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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

ROMARIO ROBERT LEWIS,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

SHANNON MCFADDEN, being duly sworn, deposes and states that she is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about April 16, 2015, within the Eastern District of New York and elsewhere, the defendant ROMARIO ROBERT LEWIS did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960.)

The source of your deponent's information and belief are as follows:¹

1. On or about April 16, 2015, the defendant ROMARIO ROBERT LEWIS arrived at John F. Kennedy International Airport in Queens, New York ("JFK"), aboard Fly Jamaica Flight 121 from Kingston, Jamaica.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

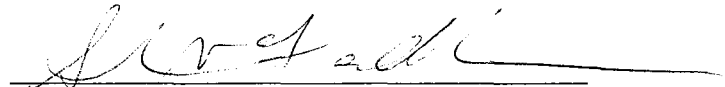
2. After disembarking the plane, the defendant ROMARIO ROBERT LEWIS, a citizen and national of Jamaica with a B1/B2 non-immigrant visitor visa, was selected for an examination by United States Customs and Border Protection ("CBP") officers. While interviewing the defendant regarding the purpose of his travel to the United States, CBP officers noticed that the defendant was nervous. When CBP officers examined the defendant's bag, they noticed that he was avoiding eye contact with the officers and was fidgeting. CBP officers conducted a pat-down search of the defendant and felt a hard object in the area of the defendant's groin. The CBP officers then conducted a partial body search, discovering that the defendant was wearing bicycle shorts under his pants, and that the bicycle shorts concealed two transparent plastic bags containing a white powdery substance.

3. The defendant ROMARIO ROBERT LEWIS removed the plastic bags from his bicycle shorts and gave them to the CBP officers. A field test of the white powdery substance was positive for cocaine. The total approximate gross weight of the cocaine and its packaging was 509.1 grams.

4. The defendant ROMARIO ROBERT LEWIS was thereafter placed under arrest.

WHEREFORE, your deponent respectfully requests that the defendant
ROMARIO ROBERT LEWIS be dealt with according to law.

Dated: Brooklyn, New York
April 17, 2015


SHANNON MCFADDEN
Special Agent
Homeland Security Investigations

Sworn to before me this
17th day of April, 2015



THE HONORABLE ROANNE L. MANN
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK